

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JOSEPHINE ROSARIO, by her Attorney-in-Fact,  
DAVID ROSARIO,

Plaintiff,

vs.

GENESIS HEALTHCARE CORPORATION d/b/a  
LOPATCONG CENTER; ABC CORPORATIONS  
(1-5) and JOHN DOE (1-5), fictitious names,

Defendants.

No. 11-CV-6757 (JAP)(LHG)

Civil Action

**AFFIDAVIT OF MERIT AS TO 390 RED SCHOOL LANE  
OPERATIONS, LLC, d/b/a LOPATCONG CENTER**

Lance R. Youles, upon his oath, deposes and says:

1. I am a Licensed Nursing Home Administrator of the State of Michigan for the past thirty-three (33) years.
2. I do not have any financial interest in the outcome of the above-referenced case which I have reviewed.
3. Based upon the records that I have reviewed, there exists a reasonable probability that the care, skill and/or knowledge exercised and/or exhibited by the Defendant, 390 Red School Lane Operations d/b/a Lopatcong Center, in the care, treatment and/or practice of Josephine Rosario fell outside the acceptable professional or occupational standards and/or treatment practice and that such care, treatment and/or practice was a cause in bringing about harm to Josephine Rosario.

  
LANCE YULES

STATE OF Michigan :  
 :SS:  
COUNTY OF Livingston :

I certify that on February 13, 2012, Lance Youles, personally came before me and acknowledged under oath to my satisfaction, that she:

- (a) is named in and personally signed this document; and,
- (b) signed, sealed and delivered this document as his act and deed.

  
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Notary Public

